

January 13, 1999

Magalie Roman Salas, Esquire
Secretary
Federal Communications Commission
1919 M Street N.W.
Washington D.C. 20554

RE: Ultra-Wideband Notice of Inquiry, FCC 98-203, ET Docket 98-153

Dear Ms. Salas:

I am responding to your Notice about modifying the Commission's rules on ultra-wideband transmission systems (spread spectrum radios). I was made aware of this comment period by others in Montana who know of my interest.

I am the Director of the Library for Richland County in Sidney Montana; a rural community located in northeastern Montana. Our budget for materials is \$11,000 per year which is indicative of our poor economy. The county has an area of 2,081 square miles and a population of 10,300. Sidney, the county seat, is the largest city with a population of 5,276. The nearest urban town is 250 miles away. In this age information access is vital for everyone. Fast and affordable telecommunications access helps to make our rural citizens no more distant from major resources than those who live in large metropolitan areas.

This region is neglected by wired telecommunication providers because of the high per capita cost. For example, there are no frame relay switches here and the Library must pay backhaul charges for internet access over wirelines to US West and we still do not have ISDN or other high speed access. I began researching other means to connect Richland County Municipal Offices, our school libraries and other resources into a WAN. We found a company in Canada. With grant money we became the first in this part of the States and the first in Montana to use wireless in a WAN.

Originally, we were only able to use the 915Mhz radios. Now we are working on links utilizing the 2.4Ghz FCC Part 15 radios. But the cost of each unit is high because they are not produced in quantity and because maximizing the transmission range allowed under current FCC rules is costly in research and development. So we have to buy more radios in order to relay the digital signal in addition to the towers for the repeaters. We have only been able to make a start with grant money, even though we know cheaper and better radios could be made if the FCC rules will let manufacturers use lower frequencies and wider bands and more power in the rural areas.

We want to network sites 20 miles away which will come together at a central point so that we can share the very high costs of telco wireline internet access. But we must use repeater radios and the present high cost of these spread spectrum radio modems makes this project beyond our means for now. Especially since this equipment does not even qualify for Federal e-rate discounts; since this program favors equipment, devices and services which provide internet access from the telcos.

I see other filings/comments which have gone into the scientific data which prove that millions of spread spectrum radios can co-exist in the same space, so I won't repeat it. It seems that the opposition is really a monopoly-----they are controlling telecommunications-----they have got a good thing going-----why would they want anything to change? God forbid competition in the marketplace.

I want the FCC to change the rules so that more than one method of providing access to the internet is available--and I want reasonable costs.

Changing these spread spectrum radio rules would allow many companies to compete in this niche to make equipment to span further distances, at faster speeds, giving the public more bandwidth at cheaper prices.

Respectfully submitted,

E. Renee Goss, Director
Sidney Public Library
121 Third Ave. N.W.
Sidney, Mt. 59270
406 482-1917
rgoss@mtlib.org